

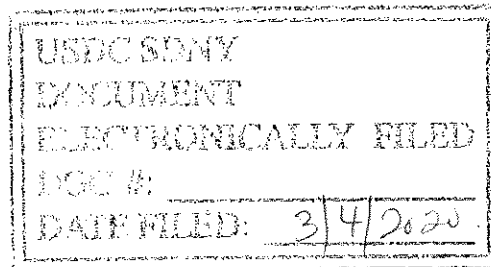
UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re Application of SOCIAL & HEALTH
INSURANCES (SZV),

Applicant,

For an Order Pursuant to 28 U.S.C. § 1782
Granting Leave to Obtain Discovery from
JPMorgan Chase & Co. for Use in Foreign
Proceedings.

Case No. 20-mc-0059 (DLC)



PROPOSED ORDER

This matter having come before the Court on Social & Health Insurances SZV's ("SZV") Application for an Order Pursuant to 28 U.S.C. § 1782 Granting Leave to Obtain Discovery from JPMorgan Chase & Co. for Use in Foreign Proceedings (Dkt. Nos. 1-3) ("Application"); and

WHEREAS SZV filed a revised proposed subpoena directed to JPMorgan Chase Bank, N.A. ("Chase") on February 10, 2020 (Dkt. No. 6-1) ("Amended Subpoena"); and

WHEREAS Counsel for SZV and Chase have conferred and agreed as set forth in this Proposed Order;


IT IS HEREBY ORDERED as follows:

1. The Application is granted, subject to the limitations set forth in this Order.
2. Request for Production No. 3 in the Amended Subpoena is withdrawn, and Chase will respond to Requests for Production Nos. 1, 2, and 4 in the Amended Subpoena within twenty (20) days of the date of this Order.

3. Any documents and information obtained from Chase in response to the Amended Subpoena will be used only in a foreign proceeding and Chase will not be a party in any such foreign proceeding.

The Clerk of Court shall close this matter.

Dated: March 4, 2020


HONORABLE DENISE L. COTE, U.S.D.J.